UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EMERGENCY RESPONSE BRANCH
2525 N. SHADELAND AVENUE, SUITE 100
INDIANAPOLIS, IN 46219

REPLY TO ATTENTION OF:
SE-GI

September 9, 2013

Mr. Bradley Adams
SESCO Group
1426 West 29th Street
Indianapolis, IN 46208

**TRANSMITTED ELECTRONICALLY**

Re: Quality Management Plan
Kokomo Dump Site (C564)
Kokomo, Indiana
Docket No. V-W-13 C-018

Dear Mr. Adams:

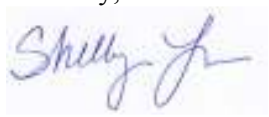
The U.S. Environmental Protection Agency completed its review of SESCO Group's (SESCO) Quality Management Plan (QMP) dated August 9, 2013. This document was submitted by SESCO to comply with Paragraph 12 of the Administrative Settlement Agreement and Order on Consent (ASAOC) between EPA and the City of Kokomo for the Kokomo Dump Site.

EPA requests that SESCO amend the QMP in accordance with the attached comments. EPA strongly recommends that prior to resubmitting the QMP, SESCO ensure that the QMP complies with *EPA Requirements for Quality Management Plans (QA/R-2)*. Failure to do so may result in EPA withdrawing approval of SESCO as the contractor.

If you believe that any changes are necessary other than those directed by EPA's enclosed comments, those changes must be discussed with, and approved by, EPA's On-Scene Coordinator (OSC) prior to re-submittal of the document. Those discussions may be memorialized in a progress report or other communication with EPA's OSC. In addition, all changes made to the document, other than those specifically at the direction of EPA, must be specified in writing to EPA upon re-submittal of the document.

If you have any questions concerning this matter, or would like to discuss the attached comments in detail, please contact me at 317-417-0980.

Sincerely,



Shelly Lam, LPG
Federal On-Scene Coordinator

cc: William Pickard, SESCO Group
Brent Graves, SESCO Group
David Guevara, Taft Stettinius & Hollister, LLP
Lawrence McCormack, City of Kokomo
Maria Gonzalez, EPA Region 5
File

## 1. Management and Organization

a. The Quality Management Plan (QMP) should be signed and dated by all senior management personnel, including the Quality Assurance (QA) Manager.
b. The documents used for the QMP preparation should be referenced (EPA Requirements for Quality Management Plans (QA/R-2), EPA/240/B-01/002 March 2001 Reissued May 2006), and American National Standard ANSI/ASQ E4-2004.
c. The organizational chart should identify all components of organization: identify the position of the QA Manager, identify lines of reporting of the QA Manager and identify any other QA staff. The submitted organizational chart does not include the QA Manager or QA staff.
d. The management and organization section should describe in details the responsibilities of the QA Manager.
e. The QMP should describe processes for resolving disputes related to quality issues.

## 2. Quality System Components

a. This section of the QMP should describe in more detail the principal quality system components (e.g., quality system documentation, annual reviews and planning, project-specific quality documentation) applicable to SESCO.
b. The descriptions of components should include more details on how they are implemented and the role of the QA manager in implementation of these components.
c. This document should identify who is preparing, reviewing and approving the QMP.
d. EPA Requirements for QAPPs (QA/R-5), EPA/240/B-01/003 Reissued May 2006 and the UFP-QAPP format should be referenced in this section of the QMP. The information for the UFP-QAPP can be found at **www.epa.gov/fedfac/documents/qualityassurance.htm**
e. The last paragraph states that "[t]he QAPP (project-specific quality documentation) maintains all work performed is consistent with IDEM guidance, standards, policies, and procedures." Replace "IDEM" with "EPA."

## 3. Procurement of Items and Services

a. The detailed process for review and approval of suppliers' quality-related documentation (Quality Assurance Project Plan [QAPP], QMP) should be included in the QMP.

## 4. Documents and Records

a. This section of QMP should describe in more detail processes for removal of obsolete documentation.
b. The QMP should describe the process for preparing, reviewing, approving, issuing, using and revising documents and records.
c. The QMP should describe the process for ensuring that records and documents accurately reflect completed work.
d. The process for establishing and implementing appropriate chain of custody and

confidentiality procedures for evidentiary records should be described in the QMP.

e. The roles, responsibilities and authorities of personnel responsible for the documentation and records should be identified in the QMP.

f. The record retention time for QA documentation should follow EPA requirements.

**5. Computer Hardware and Software**

a. The QMP should describe in more details process for developing, installing, testing, using, maintaining, controlling, and documenting computer hardware and software.

**6. Planning**

a. EPA Requirements for the QAPP (QA/R-5) and the UFP-QAPP format should be referenced in this section of the QMP.

b. The Data Identification and Specification sub-section makes several references to IDEM's guidance documents. Work conducted under the ASAOC must be conducted in compliance with EPA's policies, procedures, and guidance documents.

c. Data quality objectives (DQO) must follow EPA guidance (QA/G-4) and should reference the guidance document in this section.

d. Note that revisions to the QAPP must be reviewed and approved by EPA.

**7. Implementation of Work Processes**

a. This section of the QMP should describe the process for preparation, review, approval, revision and withdrawal of Standard Operating Procedures (SOP).

**8. Assessment and Response**

a. The process for documenting assessment and reporting the results to management should be described in detail.

**9. Quality Improvement**

a. This section should describe the process for encouraging staff to establish communications between customers and suppliers, identify process improvement opportunities, and identify and propose solution for problems.

**b.** It should be identified in this section, if the reanalysis of the samples is not possible due to holding time, that re-sampling will be performed.